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CAREER ASSESSMENT REPORT OF DAVID STEINFELD

Walters v Exel, Inc.

Statement of Opinion

I have been retained by Fisher & Phillips LLP to serve as an expert consultant and to prepare a Career Assessment Report in the matter of Jason Walters v Exel, Inc. The opinions and conclusions stated in this report are based upon my review of documents presented by Fisher & Phillips LLP, research related to the Dallas/Fort Worth employment market, job opportunities available for an individual possessing Jason Walters background, and my experience in job search methodology, career strategy and management, recruiting, and human resources.

Job seekers at all levels of experience should view their employment search as a full-time role with the goal to invest significant time in job market and company research, and networking activities. This approach to job search is prudent even in a robust job market. Developing and implementing an effective job search strategy would typically result in a shorter amount of time to secure new employment.

Regarding Mr. Walter's prospects of employment from the time of his termination in March, 2022 through the date of this report, numerous sources including the Federal Reserve Bank of Dallas Economics Indicators Reports for Dallas-Fort Worth, the U.S. Bureau of Labor Statistics Southwest Information Office Reports, an article in the Dallas Morning News, and employment postings on job boards suggest that the Dallas-Fort Worth job market remained robust though 2022 with 2023 remaining strong if not slightly down from the prior year.



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Statement of Opinion, continued

It is my opinion that Mr. Walters did not conduct a thorough and consistent job search. As a result, he failed to mitigate his damages for lost wages. Although it would be reasonable if Mr. Walters had decided to delay his job search for one to two months after his termination date of March 16th, 2022, I would have expected him to initiate meaningful job search activities by May of 2022.

Mr. Walters stated that he “tried several places, such as ABC Auto, several truck leasing, different positions” and “good prospect but turned out they did away with position”. He also claimed to have “applied at 60 places” and stated that he did not apply to any job postings in 2023. Mr. Walters sent in a resume to Whataburger but “nothing happened”. He could have reached out to one or two employment agencies to assist in his search for a new job. Mr. Walters statements related to his approach to securing new employment suggest that he is someone who is not committed to a meaningful job search.

In summary, a strong Dallas-Fort Worth job market coupled with a dedicated job search should have resulted in Mr. Walters securing a new warehouse operations supervisor or related position within four to five months after his termination date of March 16th, 2022. Experienced warehouse operations supervisor positions should pay total compensation in the range of \$55,000 to \$75,000. Warehouse operations roles at the manager level would most likely offer a higher range of compensation.

Background Information

Jason Walters lives with his wife and 16-year-old son.

Mr. Walters completed one year of college.

Mr. Walter’s early career experience included working for Tyler Equipment from 1995 to 2009.

Mr. Walters joined Exel, Inc. in June, 2011. His job focused on the warehousing and transportation of tires.



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Background Information, continued

Mr. Walters held the title of Operations Supervisor on his termination date of March 16th, 2022. He was earning approximately \$60,500 per year in total compensation.

Mr. Walters was forty-nine years old at the time of his termination.

Mr. Walters is the primary caregiver of his son.

Mr. Walters claims to have applied for employment opportunities in 2022. He did not apply to any job opportunities in 2023.

Mr. Walters is currently unemployed.

Research Sources and Methodology

I reviewed documents provided by Fisher & Phillips LLP pertaining to this matter including:

- Oral Deposition of Jason Walters.
- Plaintiff's Second Amended Original Complaint.
- Plaintiff's Responses and Objections to Defendant's Second Set of Interrogatories

Information about the Dallas/Fort Worth employment market and related job opportunities for Jason Walters were obtained from the following sources:

- Federal Reserve Bank of Dallas Economic Indicators Report for Dallas-Fort Worth dated June 30th, 2022.
- Federal Reserve Bank of Dallas Economic Indicators Report for Dallas-Fort-Worth dated September 2nd, 2022.
- U.S. Bureau of Labor Statistics Southwest Information Office Dallas-Fort Worth Area November, 2022 Employment Report dated December 29th, 2022.



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Research Sources and Methodology, continued

- U.S. Bureau of Labor Statistics Southwest Information Office Dallas-Fort Worth Area May, 2023 Employment Report dated June 28th, 2023
- Dallas Morning News article dated October 20, 2023 edition titled "Texas reaches 14 million workers as job growth bounces back in state"
- Internet job sites including "Simply Hired", "Glassdoor", and "Linked-In" for Warehouse Operations positions posted in November, 2023. Glassdoor was also reviewed for salary information for these positions.

Summary of Findings

The Dallas-Fort Worth, Texas, and national job markets were robust in 2022 and through the first half of 2023. Workers leaving the workforce coupled with a strong economy resulted in low unemployment and many job openings.

The Federal Reserve Bank of Dallas Economic Indicators Report for Dallas-Fort Worth dated June 30th, 2022 reported that robust expansion continued in the region's economy in May. DFW employment rose an annualized 8.3%. As of May, nearly all major sectors in DFW have regained the jobs lost during the pandemic.

The Federal Reserve Bank of Dallas Economic Indicators Report for Dallas-Fort Worth dated September 2nd, 2022 indicated a continuation of "broad-based expansion" in the Dallas-Fort Worth economy in July. DFW employment rose 8.5%, and the labor market continued to be "tight" with the Dallas unemployment rate holding steady at 3.5% and the Fort Worth rate edging down to 3.6%.

The U.S. Bureau of Labor Statistics Southwest Information Office Dallas-Fort Worth Area November, 2022 Employment Report dated December 29th, 2022 reported that the local rate of job gains of 6.1% compared favorably to the national increase of 3.2%. The Trade, Transportation & Utilities sector in the Dallas-Plano-Irving region experienced an increase of 28,000 jobs from November, 2021.



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Summary of Findings, continued

The U.S. Bureau of Labor Statistics Southwest Information Office Dallas-Fort Worth Area May, 2023 Employment Report dated June, 28th, 2023 noted that total non-farm employment for the Dallas, Fort-Worth-Arlington metropolitan area increased by 172,300 or 4.2% over the year.

An article appearing in the October 20, 2023 edition of the Dallas Morning News titled "Texas Reaches 14 Million Workers as Job Growth bounces Back in State" reported that the Texas unemployment rate held steady at 4.1% while Dallas-Fort Worth's jobless rate fell to 3.9% from 4.2% in August.

Job sites including "Linked-In", "Simply Hired", and "Glassdoor" were reviewed for Warehouse Operations Supervisor position listings posted in November, 2023. Jobs were in the Dallas-Fort Worth area. Note that some of these positions appear on one or more job sites and that some of the positions require an undergraduate degree.

- **Linked-In** listed 44 Warehouse Operations Supervisor positions with posted salaries between \$50,000 and \$75,000. Locations included Dallas, Fort Worth, Arlington, Garland, Irving, and McKinney.
- **Simply Hired** listed 42 Warehouse Operations Supervisor jobs with salaries ranging from \$41,700 to \$76,500.
- **Glassdoor** listed 34 Warehouse Operations Supervisor positions with salaries between \$45,000 and \$85,000.

Additional salary information from Glassdoor for Dallas-Fort-Worth:

- Warehouse Operations Supervisors with 15 or more years of experience earn a "Total Pay Range" between \$60,000 and \$93,000 per year. The most likely estimated total pay is \$74,803 per year with an average base salary of \$69,575 (November, 2023).
- Related job titles for Warehouse Operations Supervisory positions in the transportation and logistics industry include "Distribution Center Operations Manager", "Inventory Control Supervisor", and "Warehouse Operations Manager".



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Qualifications of David Steinfield as an Expert

I possess forty-five years of recruiting and general human resources background. I have lived and worked in Dallas for nearly forty years and have a deep understanding of the Dallas/Fort Worth Metroplex employment market and the requirements necessary for an effective job search.

I have owned and operated Steinfield Search Group, LP for more than thirty-two years. The firm places executive, senior management, and mid-level manager candidates for roles throughout the United States. Positions include accounting, finance, consulting (including sales and business development), operations, tax, marketing, and human resources. We have represented clients in a variety of industries including financial services, private equity, family office, insurance claims, manufacturing, distribution, retail, and healthcare.

I have provided career counseling and guidance to hundreds of employed and unemployed active job seekers, and to individuals who were evaluating the prospect of making a job and/or career change. Assistance has been offered in the areas of current job market status, career path assessment, resume writing, networking, interview preparation, and job offer negotiation.

In addition to executive search recruiting, I have been retained in more than twenty matters to serve as a consultant and/or expert witness in wrongful termination and wrongful death cases.

This Career Assessment Report is based on information provided up until the time this report was written. I reserve the right to add or update information based on receipt of additional information regarding this matter.

My hourly fee for serving as an expert consultant and witness is \$450 per hour.

Prepared by David Steinfield

Date: November 28th, 2023